



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
ENVIRONMENTAL REVIEW  
AND ASSESSMENT

June 6, 2016

Stacey Forson, Forest Supervisor  
3160 NE 3<sup>rd</sup> Street  
Prineville, OR 97754

Dear Ms. Forson:

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (DEIS) for the proposed Gap Landscape Restoration Project on the Paulina Ranger District within the Ochoco National Forest in Crook County, Oregon (EPA Project Number 15-0063-AFS). Our review was conducted in accordance with EPA responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

The FEIS analyzes the Forest Service's proposal to strategically reduce forest vegetation density and fuel loadings; increase or maintain large tree structure and hardwood abundance and diversity in riparian habitat conservation areas; and contribute to local and regional economies. Proposed project components include commercial timber harvest, noncommercial thinning, juniper removal, hardwood restoration, riparian restoration, and prescribed burning. The FEIS analyzes a no action alternative and three action alternatives. In the Draft EIS, Alternative 2 was identified as the preferred alternative. Alternative 2 remains the preferred alternative in the Final EIS. Key features of the preferred alternative are commercial and noncommercial thinning on 16,064 acres, including 1,041 acres of commercial thinning and 1,249 acres of pre-commercial thinning within riparian habitat conservation areas (RHCAs).

In our February 2016 comments on the DEIS, we indicated our overall support for Alternative 2, and made recommendations to ensure that there would be internal consistency within the document and clarity for reviewers. We appreciate the Forest's responsiveness to our comments, including the clarification that project design features do not allow for commercial harvest on slopes greater than 35 percent. We also encouraged the Forest to employ a strong monitoring and adaptive management approach. We recognize that, as noted in appendix I, the responsible official will decide in the Record of Decision (ROD) what monitoring will apply. Because the Gap Restoration Project presents an excellent opportunity to understand how treatments, such as those proposed in the RHCAs, may affect ecological interactions at the landscape scale, we hope to see a robust multi-party monitoring approach reflected in the ROD. The EPA would be pleased to participate in any future field reviews of RHCA treatments.

We appreciate the opportunity to review and comment on the FEIS. If you have any questions about our review, please contact me at (206) 553-1601, or by electronic mail at [littleton.christine@epa.gov](mailto:littleton.christine@epa.gov). You may also contact Teresa Kubo of my staff at (503) 326-2859 or by electronic mail at [kubo.teresa@epa.gov](mailto:kubo.teresa@epa.gov).

Sincerely,

A handwritten signature in blue ink that reads "Christine B. Littleton".

Christine B. Littleton, Manager  
Environmental Review and Sediment Management Unit